

# KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | SUITE 7110  
NEW YORK, NEW YORK 10118  
TEL (212) 763-0883 | FAX (212) 564-0883  
WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0883  
DIRECT EMAIL shecker@kaplanhecker.com

January 27, 2021

## VIA ECF

The Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

Re: United States v. Angel Otero, No. 15-CR-608 (KPF)

Dear Judge Failla:

We represent Mr. Otero in the above-captioned proceeding. We write to respectfully request that the Court grant a modest extension to the briefing schedule in connection with Mr. Otero's motion for compassionate release. This is the second request for an extension.

Since our first request for a one-week extension on January 12, 2021, *see* ECF No. 487, we have continued to seek to schedule calls and exchange mail with our client. While we have been able to speak with Mr. Otero twice since January 12, we experienced a significant delay in receiving key records from Mr. Otero via U.S. mail, are working to retrieve medical records prior to Mr. Otero's incarceration, seeking to contact family members, and potentially consulting a medical expert. Unfortunately, because of the substantial delays we have experienced conferring with our client—both over the phone and via U.S. mail—we require additional time to sufficiently prepare Mr. Otero's submission.

Accordingly, Mr. Otero respectfully requests that the Court grant a four-week extension to prepare his supplemental submission, and a corresponding four weeks for the Government's opposition and Mr. Otero's reply, making the new schedule:

- Mr. Otero's Supplemental Submission: March 5, 2021
- The Government's opposition: March 26, 2021
- Mr. Otero's Reply: April 12, 2021

The U.S. Attorneys' office has no objection to this request. Thank you.

Sincerely,



Sean Hecker, Esq.

Application GRANTED. The parties shall adhere to the deadlines set forth in the above letter.

Dated: January 28, 2021  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE